

BURLINGTON



DEPARTMENT

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May 13, 2009

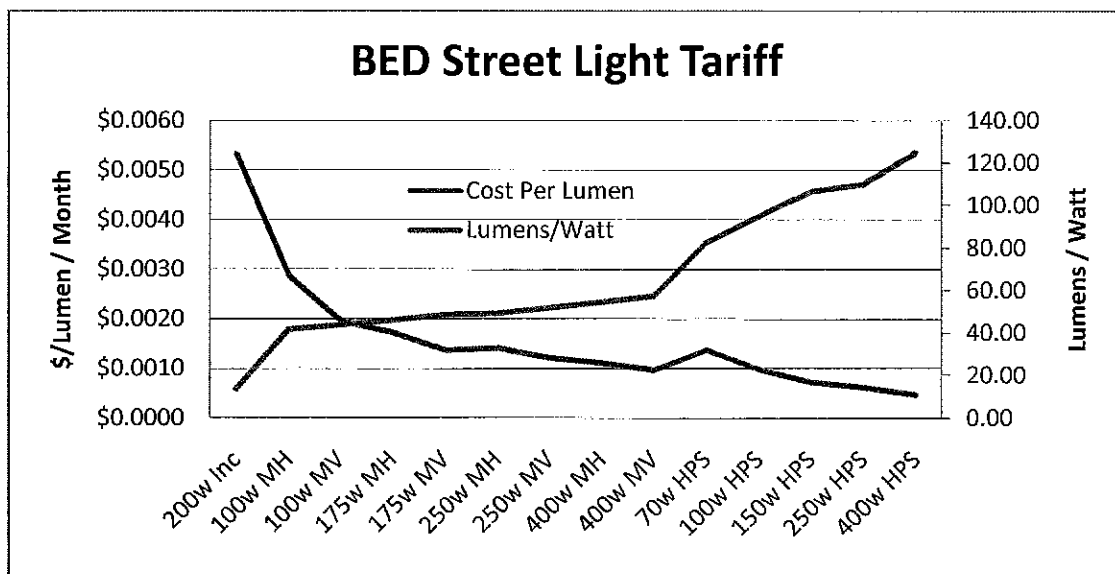
Susan M. Hudson, Clerk
Vermont Public Service Board
112 Sate Street – Drawer 20
Montpelier, Vermont 05620-2701

Re: PSB Memorandum of 4/15/2009 Re Streetlights

Dear Sue:

In its memorandum of April 15, 2009 the PSB requested information from Vermont Electric Distribution Utilities regarding potential tariff-related barriers to the installation of street lights using energy efficient technologies. The Board specifically requested that each utility indicate whether its existing street light tariff is, or is not, a barrier to high efficiency fixtures. Further, if the utility determined that its tariff represented a barrier, the Board requested that it either file a revised tariff to remove the barrier or provide the reason that it does not wish to revise the current tariff.

BED's streetlight tariff assesses a monthly charge calculated based on standard operational hours, fixture wattage, and type of lamp being utilized. The current tariff is designed such that the more efficient the lamp (in terms of lumens/watt), the lower the monthly cost per lumen (see chart below).



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Although BED's tariff does not reflect technologies of a higher efficiency than HPS, such as LED technology, BED believes it is premature to modify its tariff at this time to address the new technology. In general terms, since BED provides street lighting service only within the City of Burlington, and works with other city agencies to set street lighting standards, BED is in the position to design and promptly request approval of revised street lighting tariff schedules to incorporate more efficient technologies as city policies adjust to implement such technologies (as a result of Federal funds being available, or in the normal course of its pursuit of increased efficiency, or through changes in safety standards).

In relation to the specific question posed by the Board, BED anticipates installing a four light LED demonstration project on Center Street in Burlington within the next few weeks to gather data on the LED fixtures' ability to produce acceptable lighting levels, garner public acceptance, and adhere to approved lighting standards. These fixtures are anticipated to be owned, operated, and paid for by BED as a company test location, and will not be charged under the existing street light tariff.

In addition to the test location BED has also been working closely with Burlington's Community and Economic Development Office (CEDO). CEDO has already obtained grant funds to implement LED lighting on several downtown business district streets. BED is presently working with them and the contracted LED lighting manufacturer to design the layout, wattage, color rendition, fixture type, etc. of this proposed installation, which is anticipated to begin later this summer or early fall. Additional follow on efforts are underway related to the Church Street market place, as well as expanding onto other downtown streets that abut the business district, over the next several years. In other words, because of the unique relationship between BED and the City of Burlington BED's approach has been to first design the street lighting approach that best meets the city's needs, and then design the electric tariff to support that approach, instead of BED promulgating a lighting tariff and then trying to fit the city needs within it.

BED strongly prefers to complete its work with the city related to design and policy development before making adjustments to its street lighting tariff. BED anticipates that it will be filing a revised street lighting tariff with the Board for approval within the next several months as the city's proposed design becomes finalized. In the interim, if the Board has any specific questions, we would be happy to address them.

Sincerely,

BURLINGTON ELECTRIC DEPARTMENT



Kenneth A. Nolan
Director of Resource Planning